



SDMS DocID

2075610

**Thomas J Haines**  
Senior Counsel



**Sunoco, Inc.**  
1735 Market Street Ste LL  
Philadelphia PA 19103-7583  
215 977 6273  
Fax 215 246 8913  
tjhaines@sunocoinc.com

January 5, 2006

**FEDERAL EXPRESS**

Mr. Harry R. Steinmetz (3HS62)  
U. S. Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site, Bloomsburg, PA

Dear Mr. Steinmetz:

Attached is Sunoco, Inc. (R&M)'s response to the EPA 104(e) information request letter regarding the above captioned site.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Haines". The signature is fluid and cursive, with the first name "Thomas" and last name "Haines" clearly distinguishable.

Thomas J. Haines  
Senior Counsel

TJH/ln  
Enclosure  
cc: A. M. Donnelly

**SAFETY LIGHT CORPORATION SITE**  
**BLOOMSBURG, PENNSYLVANIA**

**SUNOCO'S RESPONSE TO USEPA REGION 3**  
**104(e) INFORMATION REQUEST**

1. **Describe in detail the business relationship between Sunoco and Safety Light.**

**Response:** The documents supplied to Sunoco by EPA with the 104(e) Information Request Letter mention Sun Oil Company three times; once in 1953 ("Authorization" Sun Oil Company no address) and twice in 1964 with an address of Bishop Hollow Road, Newtown Square, PA). It cannot be determined what facility is referenced in the 1953 entry. The Newtown Square, PA address was the location for a former development facility for the Company, which was known as Advanced Management Method Division (AMMD). AMMD was responsible for the development of equipment to be used at Sunoco's refineries. The facility closed in the early 1990s. Other than the documents provided by EPA, Sunoco has no information which identifies any business relationship between Sunoco and Safety Light.

2. **Did Sunoco ever transport and/or broker hazardous substances and/or radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?**

**Response:** Pursuant to interviews with Sunoco employees, Sunoco possesses no personal knowledge of any type of relationship with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite.

3. **If you answered "yes" to Question 2, please answer the following questions:**

**Response:** Not applicable.

- a. **Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.**

- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.**
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:**
  - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);**
  - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;**
  - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;**
  - iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;**
  - v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;**
  - vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.**
- 4. Did Sunoco ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?**

**Response:** See response to Question 2.

5. If you answered "yes" to Question 4, please address the following issues:

Response: Not applicable.

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

Response:

- i. the nature of radioactive waste or other wastes hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e. liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
  - ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
  - iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
  - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
  - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- i. disposed of or treated radioactive or hazardous materials at the Site;
      - ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
      - iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
  - c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
    - i. the persons with whom you, or other such persons, made such arrangements;
    - ii. every date on which such arrangements took place;
    - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
    - iv. the precise locations at which each material was disposed or treated at the Site;
    - v. the persons who selected the Site as the place at which materials were disposed or treated;
    - vi. the final disposition of each material involved in such transactions; and
    - vii. the names of employees, officers, owners, and agents for each transporter.
  - d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:

- i. **the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and**
  - ii. **any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.**
- e. **Provide the names, titles, and areas of responsibility of any persons, including all Sunoco employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.**

**Response:** Since the 1953 entry does not identify a facility, it is impossible to determine personnel who would have been responsible for waste disposal. As was mentioned in response to Question 1, the AMMD Newtown Square, Pennsylvania facility was not a manufacturing facility, but developed processes and equipment for Sunoco refineries, and consisted of small laboratories that worked on specific projects. The quantities of "Radium D Foil Shipments" in 1964 were very small quantities, consistent with use in a laboratory, and if this material was disposed of by AMMD, the belief is that the specific laboratory personnel would have handled disposal. To date, Sunoco has not been able to identify employees working in a laboratory using Radium D Foil in 1964.

- f. **Describe any permits or applications and any correspondence between Sunoco and any regulatory agencies regarding materials transported to or disposed of at the Site.**
- g. **Provide copies of any correspondence between Sunoco and any third party regarding materials transported or disposed of at the Site.**

- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.**
- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.**
- j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.**

**Response:**

Thomas J. Haines, Senior Counsel  
1735 Market Street / 27S-51  
Ste. LL  
Philadelphia, PA 19103

Annette M. Donnelly, Paralegal  
1735 Market Street, 27S-58  
Ste. LL  
Philadelphia, PA 19103

- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.**

**Response:**

Anthony R. Acerbo, Commodity Manager  
Shared Services Materials Management  
Environmental Contracts  
1818 Market Street  
Philadelphia, PA



Judith A. Fritsch, Senior Assistant Corporate Secretary  
1735 Market Street  
Philadelphia, PA 19103

David A. Hamilton, Senior Project Engineer  
Welding  
Philadelphia Refinery  
Philadelphia, PA

Joanne Houck, Supervisor Product Safety  
Marcus Hook Refinery / R&D D333  
Marcus Hook, PA 19061

William G. Shank, Manager Process Automation  
Shared Services C/P Process Automation  
Sunoco Philadelphia Refinery  
Philadelphia, PA

Gustav A. Ruggiero, Health and Safety Managing Consultant  
Shared Services - Engineer – Research  
Marcus Hook Refinery  
Marcus Hook, PA

Lynn Pitetti, Litigation Specialist  
Legal Litigation Staff  
1735 Market Street  
Philadelphia, PA

6. **If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, title, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.**

**Response:** Sunoco has no knowledge of any other individuals that would be able to provide a more detailed or complete response to any question contained herein or provide additional responsive documents.

7. **For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.**

**Response:** Sunoco has no knowledge of other persons that are in possession, custody or control of information or documents responsive to this Information Request. If additional information or documentation is located, Sunoco will supplement its response.

8. **If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

**Response:** Sunoco has no such information.

9. **If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:**

**Response:** The majority of records from the relevant time period would have been purged during the normal course of business and in accordance with the Company's records retention policy. As for Sunoco's corporate records retention policy, this policy was not developed until 1980. Prior to that, individual departments developed their own records retention schedules. Attached at "Attachment A" is Sunoco's Corporate Policy that was developed in 1980.

- a. **Your document retention policy;**
- b. **A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;**

- c. **A description of the type of information that would have been contained in the documents; and**
- d. **The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents and the persons who would have been responsible for the destruction of these documents.**

**Wpdata/ac3/Safety Light Corporation/104(e) Information  
Request.doc**

## **ATTACHMENT “A”**

# POLICY

| SUBJECT                                   |          |          |                          |                         |
|-------------------------------------------|----------|----------|--------------------------|-------------------------|
| RECORDS MANAGEMENT POLICY                 |          |          |                          |                         |
| ORGANIZATIONAL UNITS AFFECTED             | PAGE     | DATE     | CODE                     | NO.                     |
|                                           | 1 of 2   | 10/10/80 | CORPORATE<br>SEC. POLICY | RECORDS<br>MANAGEMENT-1 |
| SUN COMPANY, INC. AND<br>ALL SUBSIDIARIES | REPLACES | DATED    | CODE                     | NO                      |
|                                           |          |          |                          |                         |

## POLICY

A records management program has been established under the direction of the Corporate Secretary, Sun Company, Inc., in recognition of a need for the systematic control over the creation, maintenance, retention, destruction, protection and preservation of corporate records in the Company and its subsidiaries.

## DEFINITION

"Records" as used herein are any paper, microfilm or machine sensible media that contains information necessary for Company operations.

"Records Management" is a function that provides Sun Company, Inc. and its subsidiaries with a uniform records management system consistent with operating needs and within the framework of government, tax and legal requirements.

## PROGRAM

The records management program includes the preparation of records retention schedules, protection of vital records, storage of inactive records, design of filing systems, destruction of records, microfilm systems, correspondence control, records security, historical records and records centers.

Records Management will be responsible for the implementation of the above functions directly in Sun Company, Inc., and for assisting the subsidiaries in this regard. They will develop proposed records management policies, standards, procedures and techniques; conduct or be available to conduct records management studies or inspections at regular intervals at the various Sun Company and subsidiary installations in order to insure compliance with the program; make recommendations and provide assistance to correct and improve present records systems; conduct research with respect to the improvement of records practices; serve as a clearinghouse for information on records management and as central source for reference and training materials; provide the most economical and efficient utilization of people, space, equipment and supplies necessary for records creation, maintenance, use, and disposition; coordinate with the appointed records administrator the implementation and maintenance of the records program at each installation.

**POLICY**PAGE  
2 of 2DATE  
10/10/89

CODE

NO

**ADMINISTRATION IN SUBSIDIARIES**

In order to insure that an appropriate Records Management Program is implemented promptly in all subsidiaries as well as in the Company, the Group Vice Presidents have requested that the following steps be taken:

The Director of Records Management will meet with designated individuals in each subsidiary developing, implementing and maintaining an appropriate Records Program for that subsidiary.

Each Subsidiary will appoint a records administrator who will act as liason between Records Management and the Subsidiary and will be responsible for the implementation and updating of the Records Program with the assistance of Records Management.

The Director of Records Management will periodically audit the approved records program for that subsidiary and report the findings to the responsible person in the subsidiary with a copy to the appropriate Group Vice President.

The Director of Records Management will advise the subsidiaries concerning any hold that may be placed on document destruction by virtue of the issuance of subpoenas, civil investigation demands, grand jury hearings or other litigation which may make such document destruction not only inadvisable but illegal.

## OBJECTIVES OF CORPORATE RECORDS MANAGEMENT

1. To establish and maintain a Company-wide system which focuses continuous attention on records from their initial creation to their final disposition.
2. To establish and maintain records retention schedules that authorize and provide for proper maintenance, transfer and disposal of all records of the corporation.
3. To protect vital records necessary to permit the continuation or resumption of operations following a major disaster.
4. To preserve the records that reflect the history of the company.
5. To provide records centers for the economical storage of inactive records.
6. To promote the use of accepted records management techniques, standards and procedures to improve information and to realize cost savings.
7. To assist the subsidiaries in implementing and maintaining appropriate records management programs.
8. To provide consultation, training, policies and procedures to guide subsidiary and corporate personnel in carrying out their records management responsibilities.
9. To provide a central source of records management information, reference and training materials.
10. To act as a clearinghouse for information concerning company practices, government legislation and the current state of the art affecting records management.
11. To inform the subsidiary records administrator concerning any holds that may be placed on document destruction by virtue of litigation, or pending litigation, that may make document destruction inadvisable or illegal.
12. To periodically review the approved records program for corporate and for each subsidiary and report the findings to the appropriate management personnel.

Align top of FedEx Shipping Label or ASTRA Label here

**FedEx**

**PRIORITY OVERNIGHT**

**FRI**

emp: 111510 05JAN06

Deliver By:  
06JAN06

TRK# 8397 1406 4053 FORM 0200

19103 -PA-US

PHL  
17 PSQA



**FedEx** USA Airbill  
Express

Tracking  
Number

839714064053

**Recipient's Copy**

**1 From**

Date

Sender's  
Name

Phone

Company

Address

Dept./Floor/Suite/Room

City

State

ZIP

**2 Your Internal Billing Reference**

**3 To**

Recipient's  
Name

Phone

Company

Address

To "HOLD" - print FedEx location, print FedEx address

We cannot deliver to P.O. boxes or P.O. ZIP codes

Address

Dept./Floor/Suite/Room

City

State

ZIP

8397 1406 4053



**4a Express Package Service**

☒ FedEx Priority Overnight  
Next business morning

☐ FedEx Standard Overnight  
Next business afternoon

**Packages up to 150 lbs.**  
Delivery commitment may be later in some areas  
☐ FedEx First Overnight  
Earliest next business morning  
delivery to select locations

☐ FedEx 2Day  
Second business day  
FedEx Envelopes not available. Minimum charge: One-pound rate

☐ FedEx Express Saver  
Third business day

**4b Express Freight Service**

**Packages over 150 lbs.**  
Delivery commitment may be later in some areas

☐ FedEx 1Day Freight\*  
Next business day

☐ FedEx 2Day Freight  
Second business day

☐ FedEx 3Day Freight  
Third business day

\* Call for Confirmation

**5 Packaging**

\* Declared value limit \$500

☐ FedEx Envelope\*

☒ FedEx Pak\*  
Includes FedEx Small Pak, FedEx  
Large Pak, and FedEx Sturdy Pak

☐ Other

**6 Special Handling**

☐ **SATURDAY Delivery**  
Available only for FedEx Priority  
Overnight and FedEx 2Day  
to select ZIP codes

☐ **HOLD Weekday  
at FedEx Location**  
Not available for  
FedEx First Overnight

☐ **HOLD Saturday  
at FedEx Location**  
Available only for  
FedEx Priority Overnight  
and FedEx 2Day to  
select locations

Does this shipment contain dangerous goods?

☒ No ☐ Yes  
As per attached  
Shipper's Declaration

☐ Yes  
Shipper's Declaration  
not required

☐ Dry Ice  
Dry Ice 3, UN 1845

Dangerous goods (including Dry Ice) cannot be shipped in FedEx packaging

☐ Cargo Aircraft Only

**7 Payment Bill to:**

☒ Sender  
Acct. No. in Section  
I will be billed

☐ Recipient

☐ Third Party

☐ Credit Card

☐ Cash/Check

Total Packages

Total Weight

Total Declared Value\*

Total Charges

\*Our liability is limited to \$100 unless you declare a higher value. See back for details.

**8 Release Signature**

to authorize delivery without obtaining signature

By signing you authorize us to deliver this shipment without obtaining a signature  
and agree to indemnify and hold us harmless from any resulting claims.

Questions? Visit our Web site at [fedex.com](http://fedex.com)

or call 1.800.Go.FedEx 800.463.3339

Rev. 12/01/01 © 2001 FedEx Corporation U.S.A. WCL 03

446